AMENDMENTS TO THE DRAWINGS

The attached sheet of drawings includes changes to Fig. 7. This sheet replaces the original sheet including Fig. 7. Fig. 7 has been amended to conform more clearly with its corresponding detailed description.

Attachment: Replacement Sheet

Annotated Sheet Showing Changes

REMARKS

Claims 1-17 and 20-24 are pending in the application.

Claims 1-15 are allowed.

Claims 16, 17 and 20-24 stand rejected.

Claims 20-22 are amended.

Telephone Interview

The undersigned wishes to acknowledge the telephone interview conducted on January 30, 2006, and to thank Examiner Hom for affording the undersigned an opportunity to discuss Applicants' invention. The undersigned believes that the remarks in this paper are in harmony with the positions expressed during the interview.

Rejection of Claims 16 and 17 under 35 U.S.C. §102

Applicants express thanks to the Examiner for allowing claims 1-15. Claims 16-17 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Honig, et al., U.S. Patent No. 6,487,171 (Honig). Applicants respectfully traverse this rejection.

Honig fails to anticipate claim 16 because claim 16 recites various features not taught in the sections of Honig recited in the Office action. For example, claim 16 recites, in part:

> [A] first circuit coupled to the buffer, wherein the first circuit is configured to generate a first value as a function of data contained in the received data frame;
>
> a second circuit coupled to the buffer, wherein the second circuit is configured to generate a second value as a function of data contained in the received data frame; [and]
>
> a third circuit for generating a third value as a function of the first and second values, wherein the third circuit is configured to add the third value to the received data frame, wherein the third value identifies one of the plurality of data ports through which the received data frame will exit the switching fabric to reach the destination device.

Applicants are unable to find anything in the cited portions of Honig that teaches the first, second, or third circuits recited in claim 16. With respect to these circuits, the Office action cites column 2, lines 48-59 of Honig. However, the Office action does not explain, and it is not readily apparent, which elements of Honig are being compared to each of the first, second, and third circuits. Thus, Applicants respectfully request clarification because the pertinence of Honig has not been clearly explained as required by 37 C.F.R. § 1.104(c)(2). Nevertheless, Applicants have made every attempt to respond to the rejections recited in the Office Action.

The packet processor recited in Honig is not comparable to the first, second, or third circuits of claim 16. The Office action, citing column 2, lines 48-59 of Honig, states, "the processor formatting and converting the received signal to packets for the switching matrix in accordance with the types of connections clearly reads on the first, second and third circuit." Page 5. Column 2, lines 48-59 reads,

> The packet processor 26 functions to process the data destined to the ingress of the switching matrix and to process the data destined to the ingress of the switching matrix and to process the data output from the egress of the switching matrix. The packet processor . . . determines a destination output port for data received over the PHY I/O channel. For unicast transmission, the processor places the packet in one of N queues 28 corresponding to one of N output ports. For broadcast connection, the packet is places in the broadcast queue.

In contrast, claim 16 recites that the first and second circuits are configured to generate first and second values as a function of data contained in a received data frame. Honig's packet processor does not generate values as a function of data contained in a received data packet.

It is noted that claim 16 recites both first and second values computed as a function of data contained in a data frame. Thus, even if the cited portions of Honig could be shown to teach generating a first value as a function of data in a frame, which Applicants do not concede, the

cited portions of Honig do not show, teach, or suggest generating both first and second values as a function of data in a frame.

Furthermore, claim 16 recites a third circuit for generating a third value as a function of the first and second values, and the third value identifies an exit data port. While Honig's processor determines a destination output port for data, the processor does not identify the destination port by generating a third value as a function of first and second values. The third circuit further distinguishes over the cited portions of Honig because the third circuit is configured to add the third value to a data frame. Applicants also note that the third value "identifies one of the plurality of data ports through which the received data frame will exit the switching fabric." The cited portions of Honig only mention processing in a general sense and do not teach generating a value that identifies a data port through which the received data frame will exit the switching fabric.

Applicants also submit that Honig's routing tag is not comparable to the third value of claim 16. With respect to the routing tag, the Office action states, "see col. 1 lines 33-40 which recite the routing tag for identifying the destination of the packet according to the three types of connection [*sic*] i.e. as to whether it is for unicast connections, broadcast connections, or multicast connections." As previously mentioned, the third value is calculated based on the first and second values, and it is configured to be added to a data frame. In contrast, the only thing that Honig says about the routing tag is that "each call connection within the switch has associated with it a routing tag or equivalent that functions to identify the destination for the packet." Column 1, lines 37-40. Honig's routing tag is associated with call connections in a switch, but Honig does not indicate that the routing tag is configured to be inserted into a packet. While Honig's routing tag is used to identify the destination of a packet, the routing tag is not a

value that is generated as function first and second values. Thus, the third circuit recited in claim 16 clearly distinguishes over Honig.

During the telephone interview, some of the foregoing points were discussed and it was agreed that the cited portions of Honig do not anticipate claim 16. Thus, Applicants respectfully submit that claim 16 is allowable. Claim 17 depends from claim 16 and is allowable for at least the same reasons that claim 16 is allowable. Thus, Applicants respectfully request withdrawal of the rejections based on 35 U.S.C. § 102 and submit that claims 16 and 17 are in condition for allowance.

Rejection of Claims 20-24 under 35 U.S.C. §102

Claims 20-24 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Honig. Claim 20 is amended to recite:

> generating and adding routing data to the data frame received by the memory circuit, wherein the routing data is generated as a function of a destination address of the frame, and further wherein the routing data identifies one of the plurality of data ports through which the data frame will exit the switching fabric to reach the destination device.

During the telephone interview, the amendment to claim 20 was discussed, and it was agreed that claim 20, as amended, distinguishes over the cited portions of Honig. This is because the cited portions of Honig do not discuss routing data that is generated as a function of a destination address of the frame.

Applicants also submit that the cited sections of Honig do not teach other features recited in claim 20. Claim 20 recites "generating and adding routing data to the data frame received by the memory circuit." With respect to generating and adding routing data to the data frame, the Office action states,

> [S]ee . . . col. 1, lines 33-45 and col. 2 lines 48-59 which recite the routing information identifying the destination for the packet and the processor, in the I/F
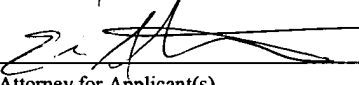
card, in accordance with the connection information determines the destination output port for the data received which clearly reads on the routing data generation circuit.

Pages 3-4. The portions of Honig cited in the rejection of claim 20 (i.e. col. 1, lines 33-45 and col. 2, lines 48-59) are the same portions that were cited in the rejection of claim 16. As mentioned in the discussion of claim 16, Honig's system for determining a destination output for data packets does not generate routing data or add routing data to a data frame. While Honig teaches "determin[ing] a destination output port for the data received," the cited portions of Honig do not teach that the determination is made by generating and adding routing data to a frame. Instead of generating routing data or adding routing data to a frame, the processor simply "places the packet in one of N queues" or places the packet in the "broadcast queue." Column 2, lines 55-59. Applicants also note that the cited sections of Honig fail to teach routing data that identified one of the plurality of data ports through which the data frame will exit the switching fabric.

Thus, claim 20 clearly distinguishes over the cited sections of Honig. Applicants submit that claims 21-23 distinguish over Honig for at least the same reasons that claim 20 distinguishes over Honig. Therefore, independent claims 20-23, as well as claim 24, which depends from claim 23, are allowable for at least the foregoing reasons. Accordingly, Applicants respectfully request withdrawal of the rejections based on 35 U.S.C. § 103 and submit that claims 20-24 are in condition for allowance.

CONCLUSION

In view of the amendments and remarks set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, the Examiner is invited to telephone the undersigned at 512-439-5093.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450,

on _____1/30/06_____ .

_____   _1/30/06_
Attorney for Applicant(s)   Date of Signature

Respectfully submitted,

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Reg. No. 38,321
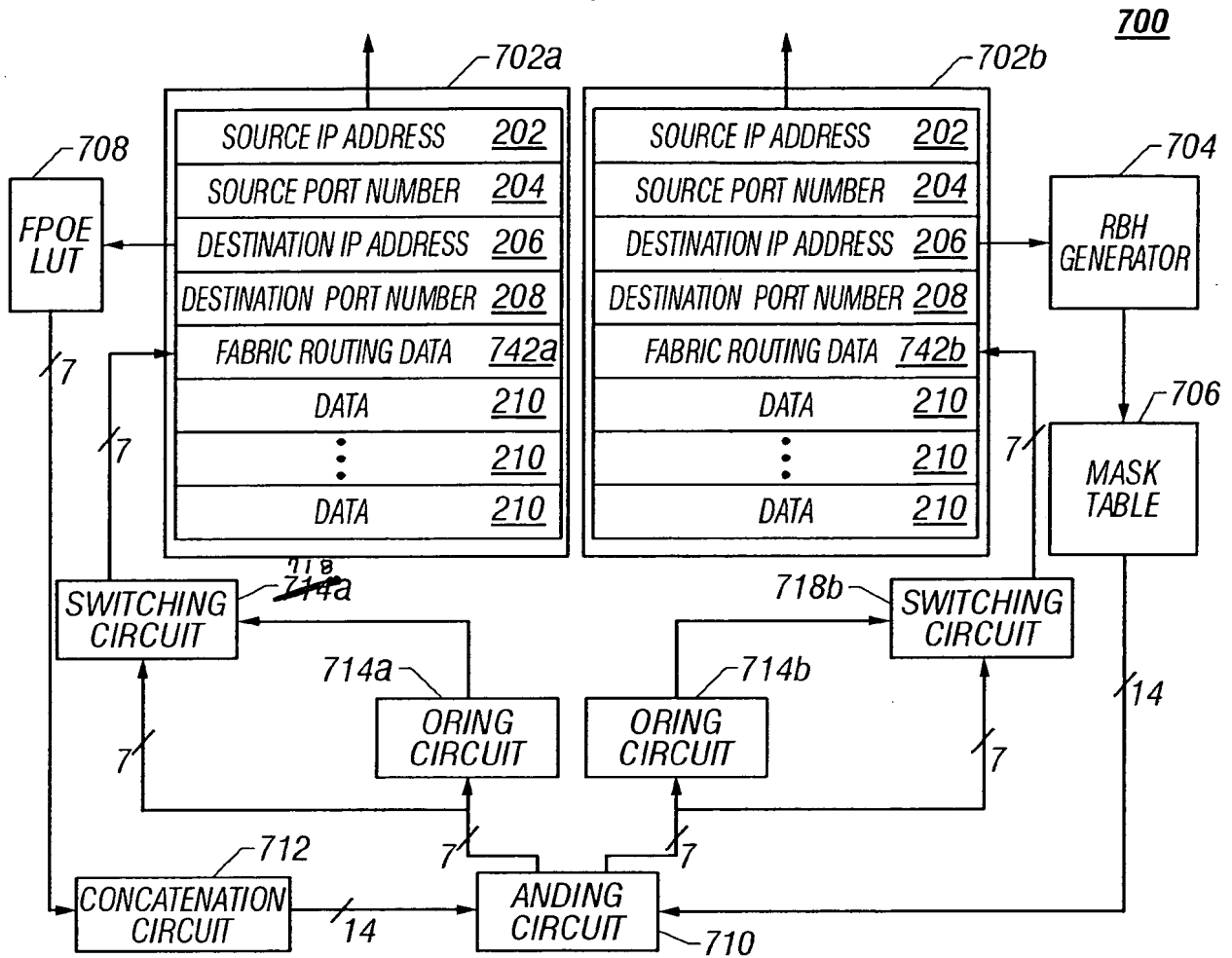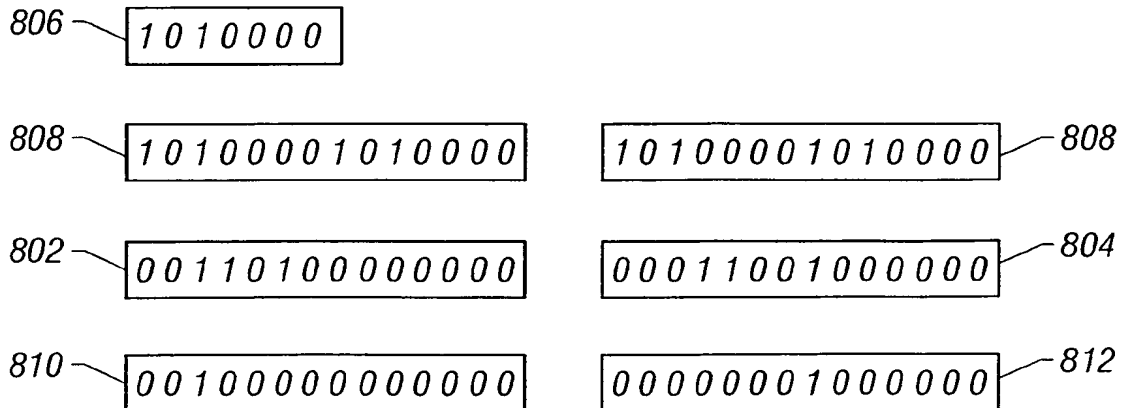Telephone: (512) 439-5093
Facsimile: (512) 439-5099

FIG. 7

FIG. 8